

Duke, Daphne

From: John Brooker <jbrooker@cvsc.org>
Sent: Monday, March 21, 2022 5:17 PM
To: Boyd, Jocelyn
Cc: PSC_Contact
Subject: [External] Letter for Santee Cooper IRP Docket 2022-23-E
Attachments: IRP Stakeholder Response Letter, March 2022.pdf

Good Afternoon Ms. Boyd,

My name is John Brooker and I am submitting this on behalf of Conservation Voters of South Carolina.

Attached please find a comment letter signed by 11 organizations involved in the Santee Cooper IRP Stakeholder process. We request that this letter be placed in the following docket and made available on the Commission's website: 2022-23-E Development and Submittal of Santee Cooper's 2023 Triennial Integrated Resource Plan to the Commission

Let me know if you have any questions, and I hope you have a nice day!

Best,
JB

John Brooker, Energy Project Manager
Conservation Voters of South Carolina
C: 513-520-7259
jbrooker@cvsc.org
www.cvsc.org

Protecting the South Carolina you love by fighting for our air, water, land, and energy through bipartisan and pragmatic political action.

**Executive Director****John Tynan**March 21st, 2022**Board of Directors****Cynthia Powell***Chair, Myrtle Beach***Paul Agnew***Due West***Marian Brailsford***Charleston***Bruce Cole***Columbia***Sue Doran***Columbia***Susan Hilfer***Vice Chair, Beaufort***Jay James***Darlington***Ben Johnson***Rock Hill***Kevin Kay***Easley***Millie Knowlton***Washington, DC***Willie Morgan***Clarks Hill, SC***Mark Robertson***Columbia***Harry Shealy***Aiken***Libby Smith***Charleston***Akin Watson***Columbia*

Conservation Voters of South Carolina
 712 Richland St, Suite A
 Columbia, SC 29201

Jimmy Staton
 President & CEO
 South Carolina Public Service Authority
 1 Riverwood Drive
 Moncks Corner, SC 29461

Dear Mr. Staton,

Let us start by thanking you and all of the employees at Santee Cooper for their work organizing the Integrated Resource Plan ("IRP") Stakeholder Process and for the robust and thorough engagement throughout the first stakeholder meeting. We appreciate the opportunity to assist in developing the most reasonable and prudent IRP, through a fair evaluation of the range of resources available to meet Santee Cooper's service obligations. In particular, we appreciate the opportunity to help develop alternative pathways for the replacement of Santee Cooper's coal assets, including the Winyah Generating Station.

At the Santee Cooper Board Meeting on January 24, 2022, Santee Cooper announced that it had issued a request for a commitment from Central Electric to join in the financing of a 2x1 Combined Cycle Unit as a Proposed Shared Resource (PSR), but indicated that the PSR would not "short circuit" a robust IRP process. The issuance of the PSR is the latest in a series of activities from 2019 forward—including the development of the Reform Plan, the narrowing of six potential combined cycle locations to one, and the funding of a natural gas feasibility study—that are aimed at refining and ensuring the viability of a plan to replace Winyah with a combined cycle natural gas plant.

We note, however, that Santee Cooper's 2019 Reform Plan and 2020 IRP did not include an alternative to the combined cycle plan, and unlike the combined cycle pathway, there does not appear to have been a series of actions aimed at preserving alternative pathways for the replacement of coal generation. We are concerned that alternative plans developed through the IRP Stakeholder process, even if technically viable, may face the claim that inadequate time remains for their implementation, or that investments already made and steps taken towards the combined cycle option will influence the choice between a combined cycle plant and other options. We, therefore, seek the following assurances at the next IRP Stakeholder Meeting.



- That Santee Cooper will, similar to the combined cycle plan, take any and all necessary steps now to preserve the viability of alternative resource options that are reasonably considered in the IRP process, including energy efficiency and demand response;
- That Santee Cooper consider including a combination of renewable and battery or other clean capacity resources within its required renewable energy procurement process and that the renewable RFP be issued in time to contribute both energy and capacity resources towards the replacement of Winyah;
- That Santee Cooper will not take any irrevocable actions, including progress towards pipeline infrastructure, that commit the utility to replace coal assets with a new natural-gas-fired resource or preclude from realistic consideration alternative resource options prior to SC Public Service Commission approval of the 2023 IRP.

These commitments would bolster transparency, collaboration, and the sense of trust and purpose between Santee Cooper and stakeholders in the IRP process and help ensure that all available options and resources are given fair consideration. Thank you again for your work addressing stakeholder concerns and we look forward to continued collaboration with Santee Cooper during this process.

Sincerely,

On behalf of Conservation Voters of South Carolina and the undersigned organizations,

A handwritten signature in blue ink, appearing to read "John Tynan".

John Tynan
Executive Director

Concerned Stakeholders from the Santee Cooper IRP Process

- | | |
|---|--------------------------------------|
| • Alder Energy Systems, LLC | • Kingdom Living Temple |
| • Carolinas Clean Energy Business Association | • New Alpha CDC |
| • The Coastal Conservation League | • Sierra Club |
| • Conservation Voters of South Carolina | • Southern Alliance for Clean Energy |
| • Good Trouble Collaborative | • Whitney M Slater Foundation |
| • Gullah Geechee Chamber of Commerce | |

CC: Letter filed with the South Carolina Public Service Commission, Docket [2022-23-E](#)